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09-28274/0200748481

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE:

Jon Paul Nelson and Karen Sue Nelson

Debtors.

Wells Fargo Bank, N.A.

Secured Creditor,

vs.

Jon Paul Nelson and Karen Sue Nelson, Debtors;  
Dianne C. Kerns, Trustee.

Respondents.

No. 4:09-bk-26177-JMM

Chapter 13

OBJECTION TO CHAPTER 13 PLAN

Wells Fargo Bank, N.A., a secured creditor, by its attorneys, TIFFANY & BOSCO, P.A., hereby objects to the proposed Chapter 13 Plan filed by the Debtor for the following reasons:

1. The Chapter 13 Plan does not adequately provide for repayment of arrearages owed to Wells Fargo Bank, N.A., pursuant to the proof of claim in the amount of \$9,761.44. Secured creditor requests that the arrearages as set forth in its Proof of Claim be paid through the Plan. A copy of Secured Creditor's Proof of Claim is attached hereto as Exhibit "A" and made a part hereof by this reference.

2. The Chapter 13 Plan filed with the Court does not provide to secured creditor repayment of its attorney fees incurred for bankruptcy and/or foreclosure proceedings. Secured creditor requests that the attorney fees as set forth in its Proof of Claim be paid through the Plan.

Secured Creditor will withdraw these objections when presented with a Stipulated Order Confirming Plan that provides for the arrearages, interest and fees as provided in the Proof of Claim and as stated above.

DATED this 12th day of November, 2009.

Respectfully submitted,

TIFFANY & BOSCO, P.A.

BY /s/ MSB # 010167  
Mark S. Bosco  
Leonard J. McDonald  
Attorneys for Secured Creditor

COPY of the foregoing mailed  
November 12, 2009 to:

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Debtors

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